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*Counsel for Defendants Inspira Health Network, Inc.  
and Inspira Medical Centers, Inc.*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

**IN RE: NEW ENGLAND  
COMPOUNDING PHARMACY, INC.  
PRODUCTS LIABILITY LITIGATION**

**Document Electronically Filed**

MDL No. 1:13-md-2419-FDS

**THIS DOCUMENT RELATES TO:**

*Jones v. New England Compounding Pharmacy, Inc.,  
et al.*, Civ. No. 13-10409-FDS;  
*Ramos v. New England Compounding Pharmacy, Inc.,  
et al.*, Civ. No. 13-10410-FDS;  
*Rios, et al. v. New England Compounding Pharmacy,  
Inc., et al.*, 13-10411-FDS;  
*Rivera, et al. v. New England Compounding Pharmacy,  
Inc., et al.*, Civ. No. 13-10412-FDS;  
*Tayvinsky, et al. v. New England Compounding  
Pharmacy, Inc., et al.*, Civ. No. 13-10414-FDS;  
*Gould, et al. v. New England Compounding Pharmacy,  
Inc., et al.*, Civ. No. 13-10444-FDS;  
*Normand, et al. v. New England Compounding  
Pharmacy, Inc., et al.*, Civ. No. 13-10447-FDS

**MOTION FOR ADMISSION OF  
LOUIS R. MOFFA, JR., *PRO HAC VICE***

Pursuant to Local Rule 83.5.3, Defendants Inspira Health Network, Inc. and Inspira Medical Centers, Inc. (formerly known as South Jersey Health System, Inc. and South Jersey Hospital, Inc.) (collectively, “Inspira”), by their undersigned attorney, move this Court to admit Louis R. Moffa, Jr., of the law firm Montgomery, McCracken, Walker & Rhoads, LLP, *pro hac vice* for purposes of the above-captioned matters, and state:

1. The undersigned is a partner at the law firm of Montgomery, McCracken, Walker & Rhoads, LLP, located at LibertyView, Suite 600, 457 Haddonfield Road, Cherry Hill, New Jersey 08002, and is a member in good standing of the bars of the State of New Jersey, the Commonwealth of Pennsylvania, the State of New York, the United States Supreme Court, the United States Court of Appeals for the Third Circuit, and the United States District Courts for the District of New Jersey, the Eastern District of Pennsylvania, and the Eastern District of Michigan.

2. The undersigned was counsel of record for Inspira in these actions prior to transfer by the Judicial Panel for Multidistrict litigation and, pursuant to this Court's February 15, 2013 Order, MDL Order No. 1 (Doc. No. 4 in MDL No. 1:13-md-02419), is exempted from the local rule requiring retention of a local attorney and *pro hac vice* admission.<sup>1</sup>

3. Attorney Louis R. Moffa, Jr., is a partner at the law firm of Montgomery, McCracken, Walker & Rhoads, LLP, located at LibertyView, Suite 600, 457 Haddonfield Road, Cherry Hill, New Jersey 08002, and is a member in good standing of the Bars of the State of New Jersey, the United States District Court for the District of New Jersey, the Commonwealth of Pennsylvania, the United States District Court for the Eastern District of Pennsylvania, the District of Columbia, the United States District Court for the District of Columbia, the United States Supreme Court and the Courts of Appeal of the Third, Fourth, Ninth and District of Columbia Circuits.

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<sup>1</sup> Attorney Moffa entered his appearance on behalf of South Jersey Health System, Inc. and South Jersey Hospital, Inc. prior to the transfer order in *Hannah v. New England Compounding Pharmacy, Inc., et al.*, Civ. No. 13-10407-FDS. Pursuant to MDL Order No. 1, Mr. Moffa is exempted from the local rule requiring retention of a local attorney and *pro hac vice* admission in the *Hannah* matter.

4. As shown by his Declaration filed herewith: (i) Louis R. Moffa, Jr., is a member in good standing of the Bar in every jurisdiction in which he has been admitted to practice; (ii) there are no disciplinary proceedings pending against him as a member of the Bar in any jurisdiction, and (iii) Mr. Moffa is familiar with the Local Rules of the United States District Court for the District of Massachusetts.

5. The required filing fee in the amount of \$100.00 has been paid.

**WHEREFORE**, Inspira moves for the admission of Attorney Louis R. Moffa, Jr., *pro hac vice*, to appear as co-counsel in the above-referenced matters.

Respectfully submitted,

MONTGOMERY, McCRACKEN, WALKER  
& RHOADS LLP

Dated: September 19, 2013

/s/Stephen A. Grossman

Stephen A. Grossman (NJ Bar ID 033681997)  
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*Counsel for Defendants Inspira Health Network,  
Inc. and Inspira Medical Centers, Inc.*

**CERTIFICATE OF SERVICE**

This is to certify that a copy of the foregoing has been filed with the Clerk of the Court on September 19, 2013 using the CM/ECF system which sent notification of this filing to all ECF registered counsel of record via e-mail generated by the Court's ECF system.

/s/Stephen A. Grossman  
Stephen A. Grossman